

VOICEPULSE INC.

Rd.

VoicePulse Inc.
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November 28, 2005

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **E911 Requirements for IP-Enabled Service Providers, WC Dockets 05-196;**
Compliance Letter of VoicePulse Inc.

Dear Ms. Dortch:

VoicePulse Inc. respectfully submits this Compliance Letter pursuant to 47 C.F.R. § 9.5(f) and to the Commission's November 7, 2005 Public Notice in the above referenced proceeding.

Please refer any questions or correspondence regarding this report to me at the address below.

Sincerely,

/s/

Ravi Sakaria
President & CEO
VoicePulse Inc.
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Compliance Letter – VoicePulse Inc.
Interconnected VoIP Provider 911 Compliance Letter
(re: WC Docket No. 05-196)

1. 911 Solution.

VoicePulse shares the Commission's high regard for the importance of providing E911 service to subscribers as quickly as possible and has dedicated significant engineering resources toward developing and implementing such a solution. After careful analysis of the technologies available from several 911 service providers, we currently feel that purchasing services from Intrado will offer our subscribers the most robust solution in terms of safety, reliability and geographic coverage.

VoicePulse intends to continuously evaluate available 911 service offerings from various companies, and anticipates obtaining service from more than one provider when doing so will benefit subscribers in terms of safety, reliability and geographic coverage.

Although we continue to work diligently at developing the systems, methods and procedures required to deliver 911 services to our subscribers and to interface with a 911 service provider such as Intrado, VoicePulse has not yet executed an Agreement to purchase services from Intrado or any other provider of 911 services. We respectfully suggest that the Commission create a process for certifying third-party 911 solutions so that prior to entering a binding Agreement with, and committing financial resources for a fixed duration to a 911 service provider, interconnected VoIP Service Providers such as VoicePulse may have some clarification regarding the compliance status of such services.

The E911 solution available through Intrado provides a true E911 solution for VoIP Service Providers (VSP). Intrado handles all aspects of the VoIP 911 call delivery and VoIP Positioning Center (VPC) functionality such as Master Street Address Guide (MSAG) Address Validation, ESQK management, Geocoding, real-time provisioning and routing determination. Included in the Service is also the call delivery component to ensure the 911 call reaches the appropriate selective router and Public Safety Answering Point (PSAP).

VoicePulse is responsible for the ongoing delivery of address and telephone number information via a real-time interface and for the connectivity to Intrado's network to enable live 911 call delivery.

a. 911 routing Information/Connectivity to Wireline E911 Network.

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Currently, Intrado's deployment schedule indicates that access to 154 E911 Selective Routers will be available by November 28th, 2005. Because VoicePulse is still in the process of finalizing an Agreement to purchase 911 services and develop the interface to Intrado's network, the number of Selective Routers to which VoicePulse is connected (directly or indirectly) as of November 28th, 2005 is zero.

b. Transmission of ANI and Registered Location Information.

Through Intrado, in the event of a 911 call, VoicePulse will transmit ANI and Registered Location to all answering points that are capable of receiving and processing this information as described here:

- i) Quantification, on a percentage basis, of how many answering points within the provider's service area are capable of receiving and processing ANI and Registered Location information:

According to Intrado, currently 93% of the US population is served by PSAPs operating off an E9-1-1 Selective Router (and therefore capable of receiving and processing ANI and Registered Location information). Based on this information, we estimate that the percentage of answering points within VoicePulse's service area that are capable of receiving and processing ANI and Registered Location information is roughly 80%. VoicePulse respectfully submits that it lacks the information needed to provide an accurate response to this question because while the data available from Intrado does reflect the percentage of US population served by PSAPs operating off an E911 Selective Router, it does not give the percentage of PSAPs operating off an E911 Selective Router.

- ii) Quantification of the number of subscribers on a percentage basis, whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information:

Once VoicePulse has completed integration with Intrado's 911 services, VoicePulse will transmit ANI and Registered

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Location for 100% of customers to answering points that are capable of receiving and processing this information.

- iii) If the provider is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation of why note:

Because VoicePulse is still in the process of finalizing purchase of Intrado's 911 services, as of November 28, 2005, VoicePulse is not yet transmitting ANI and Registered Location information to any answering points.

c. 911 Coverage.

As of November 28, 2005, VoicePulse is still in the process of finalizing purchase, integration and testing of 911 services from Intrado. As a result, VoicePulse is not in compliance in any part of the U.S.. By January 2006, VoicePulse plans to have completed integration and testing with Intrado's service, and will be providing coverage according the Intrado's deployment schedule. The attached "Major Market Deployment Map", which corresponds with MSAs, identifies regions within the US that have connectivity to at least one Selective Router, ALI steering capabilities; ANI and the ability to populate ALI. The planned deployment dates are shown on the diagram.

2. Obtaining Initial Registered Location Information.

At the point of sale, VoicePulse requires customers to provide physical address information. Orders for service are not accepted without this information. This information is fed to Intrado's systems for near real-time delivery of updates.

VoicePulse has obtained this information for 92% of its existing customers and is aggressively pursuing obtaining the information for the remainder.

3. Obtaining Updated Registered Location Information.

Customers have the ability to update Registered Location information via a web portal, or by calling a VoicePulse customer service agent on the telephone. The latter method permits customers to use the same equipment that they use to access their interconnected VoIP service.

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4. Technical Solution for Nomadic Subscribers.

Through the use of Intrado's XML interface, the E911 solution will enable near real-time provisioning (Geocoding and MSAG validation) of newly provisioned addresses and make available (assuming no errors) the updated information for delivery to the PSAP within 15 minutes of receipt.

VoicePulse recognizes the need for removing user interaction and manual submission of address information. To that end, VoicePulse is actively researching systems which would detect when customers may be utilizing service from new locations.

Contact Information

- The person responsible for VoicePulse Inc.'s compliance efforts regarding the *VoIP E911 Order* is:
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